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## FROM LAW ENFORCEMENT TO PROTECTION? INTERACTIONS BETWEEN SEX WORKERS AND POLICE IN A DECRIMINALIZED STREET-BASED SEX INDUSTRY

LYNZI ARMSTRONG\*

*Legislative approaches to the sex industry are hotly debated internationally and in recent years interest in decriminalization of sex work has been growing. However, activities relating to commercial sex remain criminalized in many parts of the world. Street-based sex work is most often criminalized and is often more aggressively policed than indoor work. This paper explores changes in the relationship between police and street sex workers in New Zealand since the decriminalization of sex work in 2003, from the perspective of sex workers, police and support agencies. This paper concludes that decriminalization enabled a dramatic shift in the approach to policing sex work and emphasizes the importance of these findings in the context of global debates on prostitution law reform.*

Keywords: sex work, decriminalization, policing, violence

### *Introduction*

In the context of global concerns about commercial sexual exploitation and debates regarding prostitution law reform, this paper explores how decriminalization of sex work impacted interactions between police and street-based sex workers in New Zealand. Despite decades of campaigning by sex worker rights organizations around the world, decriminalization of sex work is still relatively uncommon. Against a global backdrop of criminalization of those involved in sex work, this paper contributes to the growing body of research documenting the ways in which decriminalization can impact on the safety, human rights and well-being of sex workers. The analysis is focused on the experiences of street-based sex workers, a population understood to be particularly vulnerable. As such, this paper demonstrates how decriminalization has very specific impacts for a group who are often central to debates on prostitution law reform. This paper illustrates how decriminalizing sex work in New Zealand has shifted the balance of power between police and sex workers in two distinct ways: first, in reducing the power police have over sex workers by removing the risk of arrest; and second, empowering sex workers through the provision of rights. The findings of this paper contribute to broader debates on prostitution law reform by highlighting how decriminalization can transform the relationship between police and sex workers on the street, which has wide ranging benefits for sex-worker safety.

### *The decriminalization debate*

For centuries, sex workers have been marginalized and stigmatized in society, through the criminalization of their work and widespread denial of their labour rights. Despite

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almost 50 years of campaigning by sex-worker rights advocates against the criminalization of sex work, sex workers remain criminalized in many parts of the world. Campaigns against the criminalization of sex work in recent years have been accompanied by calls to fully decriminalize sex work in countries such as the United Kingdom and Canada. The decriminalization of sex work is, however, hotly debated. Activists and scholars in favour of full decriminalization argue that this legislative change is essential to safeguard the health, safety and human rights of sex workers (Pyett and Warr 1999; Day and Ward 2007; Goodyear and Cusick 2007; Brooks-Gordon 2008; Jeffrey and Sullivan 2009). Those who disagree, often radical feminist activists and academics, posit that full decriminalization would do little to protect sex-worker safety, arguing instead that it would make them more vulnerable by fostering an environment in which men feel entitled to use women's bodies (Raymond 2003; Farley 2004). Proponents of this perspective argue that sex workers are primarily economically disadvantaged women, with histories of abuse, and that no one woman would consciously choose to sell sex (Barry 1984; Jeffreys 1997). While sex workers are constructed as victims, clients are collectively described as abusers who should be criminalized (Ekberg 2004). However, supporters of full decriminalization critique this approach, arguing that the criminalization of clients would make sex workers even more vulnerable since they would need to meet clients in more isolated locations where they would not be visible to police (Krüsi *et al.* 2014). The decriminalization of sex work is therefore subject to a long and complex debate that is characterized by broader questions of choice, agency and victimhood. The nature of this debate also varies according to the particular sector in question and the specific country in which sex is sold. A full account of these debates is beyond the scope of this paper, which focuses on the decriminalization of street-based sex work in New Zealand, and how this policy change impacted the relationship between street-based sex workers and police. However, this paper makes a unique contribution to this broader debate. The existence of street-based sex work is often used to justify keeping at least parts of the sex industry criminalized and is portrayed as the particularly dark and dangerous side of prostitution (Raymond 2003). What this paper offers is an insight into how decriminalization can specifically benefit the population of sex workers who are widely understood to be the most vulnerable, focusing on their perceptions and experiences of police. The findings highlight how the provision of rights can afford sex workers greater agency and control in a context in which they are typically understood as inherently disempowered.

### *Street-based sex work, violence and policing*

Debates regarding the decriminalization of sex work often focus on the vulnerability of sex workers, particularly in the context of violence and harassment. It is well documented that violence is a risk managed by sex workers in the course of their work (Silbert and Pines 1981; Miller 1993; O'Neill 1996; Pyett and Warr 1997; Farley 1998; Phoenix 1999; Farley and Kelly 2000; Lowman 2000; Plumridge 2001; Valera *et al.* 2001; Vanwesenbeeck 2001; Williamson and Folaron 2001; Busch *et al.* 2002; Sanders 2004; Wotton 2005; Kinnell 2006b; Kinnell 2008; Rhodes *et al.* 2008; Abel 2010). While all sex workers are vulnerable to experiencing violence, it has been suggested that street-based sex workers are more vulnerable than indoor sex workers. One UK study, which

compared the experiences of on-street and off-street sex workers, found that 81 per cent of the 115 on-street sex workers surveyed had experienced violence compared with 45 per cent of 125 sex workers based in indoor venues (Church *et al.* 2001). In another study, higher fear of violence and higher incidence of violence were reported by street-based workers by comparison to indoor sex workers (Pyett and Warr 1999). The evidence overwhelmingly suggests that whilst most interactions with clients are problem free, street-based sex workers are likely to experience at least one incident of violence during their working lives (Phoenix 1999; Sanders 2001; Salfati *et al.* 2008; Shannon *et al.* 2009). The disparity in rates of violence experienced by street-based sex workers compared with indoor sex workers can in part be explained by the broader risks and diverse perpetrators managed by sex workers on the street (Krüsi *et al.* 2014). The visibility of sex workers on the street means that they manage risks of violence not only from people who approach them as clients but also from passersby who abuse and harass them and from street associates such as minders and other sex workers who may use stand over tactics against them (Armstrong 2014).

The vulnerability of street-based sex workers to being targeted with violence means it is especially important that they can trust the police to respond to violence when they report it. However, street-based sex workers may be particularly suspicious or hostile towards police (Jones and Newburn 2001). This lack of trust in the police can largely be attributed to a long history of criminalization and poor treatment, meaning that those who work on the street often lack confidence in the justice system (Pyett and Warr 1997; 1999). Street-based sex workers have been socially constructed as inherent victims who lack agency and are in need of rescue (Phoenix 2008). However, despite this, they somewhat paradoxically bear the brunt of criminalization and are arrested more frequently than indoor workers (Hubbard 2004; Phoenix 2006). In the United Kingdom, for example, it is legal to buy and sell sex but it is illegal to solicit for sex. Since street-based workers publically solicit to get work, they are the most likely group to be arrested. Sex workers who are even suspected of soliciting can receive a caution even if there is not enough evidence to take the case to court. Such cautions remain on an individual's record for life, potentially limiting future employment prospects (Mullin 2015). In this context, police are also tasked with issuing street-based sex workers with Anti-Social Behaviour Orders (ASBOs), as a measure to 'protect' communities from prostitution (Pitcher *et al.* 2006; Sagar 2007). Although selling sex is not an imprisonable offence, sex workers can receive a prison sentence if they breach an ASBO (Sanders *et al.* 2009). Street prostitution is typically defined as a 'problem' to be solved and police are often tasked with moving sex workers and their clients out of the public space (Brooks-Gordon 2006). Police in the United Kingdom have also been involved in 'naming and shaming' of sex workers (Thornton 2003). While in more recent years the policing of sex work in the United Kingdom has in theory become more 'welfarist' in approach, street sex workers continue to manage the risk of criminalization (Sanders *et al.* 2009). In recent years, momentum has been growing in calls to decriminalize sex work, with international organizations such as Amnesty International, the World Health Organization and UNAIDS recommending the decriminalization of sex work in the interests of the health, safety and human rights of sex workers (Murphy 2015). However, at the time of writing this paper, New Zealand is the only country in the world where street-based sex workers can freely work on the street without the fear of arrest. Although street work is also decriminalized in the Australian state of New South

Wales, sex workers can only work on the street within specific boundaries (Perkins 1993; Quadara 2008; Sullivan 2008). Full decriminalization of street sex work in New Zealand is, therefore, a particularly unique approach and much can be learned from the experiences of sex workers in this context.

It is particularly important to consider the potential impacts of decriminalization on interactions between police and sex workers, since criminalization has been associated with a number of negative outcomes, particularly in relation to safety. When street sex work is criminalized, and aggressive policing strategies are in place, sex workers not only find it more difficult to report violence they experience—their ability to manage risks of violence is compromised. A recent study conducted in Canada found that when clients were targeted by police, sex workers rushed screening practices<sup>1</sup> and got into cars quickly (Krüsi *et al.* 2014). A number of previous studies have also found that criminalization and aggressive policing strategies undermines screening (Barnard 1993; Sanders 2001; Wotton 2005; Krüsi *et al.* 2014).

When sex workers live in fear of arrest, they are also vulnerable to exploitation by a range of actors, including police. In New South Wales, for instance, prior to 1979 when most activities associated with sex work were criminalized, sex workers reported being blackmailed by police officers to avoid arrest (Frances and Gray 2007; Donovan *et al.* 2008). It has also been suggested that in criminalized contexts, police sometimes do not take violence against sex workers as seriously as they do against non-sex-working women (Kinnell 2008). As a result, it has been noted that receiving help from the police in such contexts is *the luck of the draw* (Williamson and Folaron 2003: 279). When police are tasked with arresting sex workers on the street, it is hardly surprising that sex workers lack trust in the police and their ability to respond to violence perpetrated against them. A number of studies have highlighted the fact that violence against sex workers is under-reported (McKeganey and Barnard 1996; May *et al.* 1999; Church *et al.* 2001; Connell and Hart 2003).

However, it is important to note that it is not impossible for police to adopt a more positive approach to working with sex workers in places where street sex work is criminalized. For instance, Merseyside Police in the United Kingdom began responding to violence against sex workers as hate crime in 2006 and changed their approach to working with sex workers to one where the protection of sex workers and building trust in police was prioritized (Campbell 2014). However, while senior officers have proactively championed the approach, it has been noted that sustaining change amongst the wider population of sworn officers on the ground is an ongoing challenge (Campbell 2014). Although progressive approaches are possible in areas where street sex workers are criminalized, criminalization complicates the relationship between police and sex workers. The long history of street sex workers being criminalized, police being tasked to solve the ‘problem’ of street prostitution and community pressure for more aggressive law enforcement means that relationships between police and street sex workers are particularly complex.

### *The decriminalization of sex work in New Zealand*

Sex work was decriminalized in New Zealand in 2003 with the passing of the Prostitution Reform Act (PRA). The PRA repealed existing legislation, which removed the risk of

<sup>1</sup> Screening is a process sex workers go through to decide whether or not to accept a client, which may involve a visual assessment of the client and an evaluation of verbal communication and body language.

arrest for sex workers. The legislation also afforded rights to sex workers, meaning that they now have considerable freedom to choose where they work and to challenge exploitation (Armstrong 2010). The inclusion of street-based sex work is a particularly unique feature of the law in New Zealand, since street-based sex workers are most often criminalized, stigmatized and objected to due to their visibility in the public space. The decriminalization of street-based sex work arguably provided an opportunity for a shift in the relationship between police and street-based sex workers. When prostitution is decriminalized, it may be expected that some improvement in the relationship between police and street-based sex workers will naturally occur, since police are no longer tasked with controlling the industry. Previous research carried out to evaluate the impacts of the PRA highlights positive change in how street-based sex workers perceived the police since the law change. Street-based sex workers were more likely to report that most police cared for their safety, compared with private and managed indoor workers, and they were significantly more likely than managed indoor workers to report that the police attitude towards them had improved since the law change (Prostitution Law Review Committee 2008; Abel 2010). However, the findings also suggest that some challenges remain. This paper further extends existing knowledge in this area, by exploring the complexities of the changing relationship between street sex workers and police in New Zealand and discussing the significance of these findings in the context of global debates on prostitution law reform.

### *The Research*

This research formed part of a three-year study, which explored the strategies used by street-based sex workers in Wellington and Christchurch to manage risks of violence in their work. The principle aim of the research was to explore strategies used by women working on the streets as sex workers to manage risks of violence and to consider the significance of these findings in the context of decriminalization, which has been in place in New Zealand since 2003. This paper focuses on one aspect of this research and explores the extent to which the relationship between street sex workers and police had changed since sex work was decriminalized. A total of 34 in-depth interviews were conducted with 28 women who were either currently or very recently working on the street as sex workers. Interviews were also conducted with 17 key informants with an interest in sex-worker safety, including four police officers.

Interviews with sex workers were focused on entry into sex work, perceptions of risk, experiences of violence, strategies to manage risks and perceptions of impacts of the 2003 PRA. Interviews with key informants were focused on perceptions of the risks involved in street-based sex work, awareness of strategies to support sex-worker safety, perceptions of the impact of the PRA and changes for the future to further support the safety and well-being of street-based sex workers. Interviews with sex workers and key informants both included questions on the extent to which the relationship between police and sex workers had changed since the decriminalization of prostitution in 2003.

The research was conducted to further enhance understandings of how the decriminalization of sex work had affected street-based sex workers, with a specific focus on the management of risks of violence. Central to this was exploring the extent to which their interactions with police had changed since decriminalization, and the nature



and impact of any changes that had occurred. The first five sex-worker interviews and two key informant interviews were conducted in Wellington, where there is a very small population of street-based sex workers. However, Wellington is home to the national office of the New Zealand Prostitutes Collective and the organization was the most important 'gatekeeper' in establishing initial contact with sex workers. Therefore, although Wellington is home to small number of street-based sex workers, the city represented the most appropriate location to start the research. The remainder of the interviews was conducted in Christchurch, the main city in the South Island of New Zealand, where there is a larger street sex-work population: 26 per cent of sex workers in Christchurch work on the street (Abel *et al.* 2007).

The street sex-work population in New Zealand comprises primarily New Zealand-born cisgender women. However, a smaller population of New Zealand-born transgender women also work on the street. This research focuses specifically on the experiences of New Zealand-born cisgender women who work on the street. The decision to focus specifically on cisgender women's experiences was made because transgender women may experience complex forms of violence relating to broader prejudice and including these experiences was beyond the scope of the study. However, further research with transgender women who work on the street is important to better understand the nature of the violence they experience.

Prior to commencing the fieldwork, ethical approval was granted by Victoria University of Wellington Human Ethics Committee. All qualitative research on sensitive and personal topics involves a degree of physical and emotional risk (Lee-Treweek and Linkogle 2000). However, as sex work is a highly stigmatized activity and violence is a particularly sensitive topic, there were a number of ethical issues that had to be managed throughout the research process. Central to this was prioritizing the physical and emotional safety of all research participants and the researcher. All sex workers and key informants were provided with an information sheet and a consent form to sign before participating in an interview. Participants were assured that interviews were confidential but were informed that confidentiality could be broken if they disclosed that they or someone else was in a situation where they could be seriously harmed. Since all interviews with sex workers were focused in part on exploring their perceptions and experiences of violence, this was an important but complex consideration. Many of the women disclosed violence that they had not reported, and discussing the reasons for their non-reporting was also a focus of each interview. In case an interview participant required support following the interview, contact details for relevant support services were taken to interviews so that they could be connected with services if required. The research was carried out with the support of the New Zealand Prostitute's Collective (NZPC), an organization that works with sex workers to support their safety, health and human rights. While the content of each interview was strictly confidential, this support meant that women could be easily connected with outreach staff if required. In most cases, the women who took part in interviews were already well connected to services. However, these were important considerations given the sensitive nature of the research.

Protecting the identities of the sex-worker participants was also an important issue. Since sex work is heavily stigmatized, many sex workers' work in secrecy and use 'working names' to protect their identity. All interviews took place in a location that was mutually agreed with the respondent. If we were approached during an interview, I resolved

to say that the research was on ‘women’s health’. None of these situations eventuated but these were very important considerations given the sensitive topics discussed (see [Armstrong 2012](#) for a fuller account of the ethical issues negotiated).

The first three interviews with sex workers were arranged by contacts at NZPC in Wellington and the remaining participants were recruited using snowball methods, with support from contacts at NZPC and at the Salvation Army run drop-in centre. The interviews were approximately one hour in duration and were recorded and transcribed verbatim. All participants were offered the opportunity to choose a pseudonym. A few of the women preferred for a pseudonym to be chose on their behalf and this was respected. Key informant organizations are also anonymous, with the exception of NZPC as the organization requested that quotes be attributed to them.

The majority of the women interviewed for this research had worked in the sex industry prior to it being decriminalized in 2003 ( $N = 23$ ). The research therefore provides insights from women who worked in the sex industry both before and after the law changed. The age of the women interviewed ranged from 17 to 57 years old. The average age of entry into sex work was 20 years old; however, this varied considerably. One woman described becoming involved in street prostitution at the age of 12, whereas another had started working in the sex industry when she was 45. Thirteen of the women identified as New Zealand European, 14 as Māori and one as Cook Island Māori. The women had worked in the sex industry for varying lengths of time between 2 months and 22 years. [Table 1](#) below provides an overview of how long each participant had worked in the sex industry prior to the interview.

Key informants were selected on the basis of their experience working with sex workers or direct involvement in public debates specifically relating to street-based sex work. These key informants included individuals and representatives of organizations, including four staff from the NZPC, six volunteers and staff from two youth and social-service-based organizations, two staff members from a drugs harm-minimization organization, a local community leader, four police officers and a local councillor. All of the police key informants interviewed had been working as sworn police officers prior to decriminalization and could therefore comment on how the law change had impacted their interactions with sex workers.

### *The Findings*

#### *Lifting the long shadow of criminalization*

A wealth of research with street-based sex workers in New Zealand and internationally shows that when street-based sex work is criminalized and policed, sex workers often

TABLE 1 *Number of year’s respondents worked in the sex industry*

Length of time working in the sex industry	
Less than one year	2
One to two years	2
Three to four years	1
Five to ten years	16
More than ten years	7



report negative experiences with police (Frances and Gray 2007). In such contexts, police yield considerable power over sex workers since they can arrest them for soliciting. A conviction for a prostitution-related offence has significant consequences and thus in these contexts sex workers may regard police not as a source of protection but as a risk to be managed (Sanders 2004). The findings of this research show that whilst the legacy of criminalization represented a long shadow of police power over the women, they felt more respected by police since the law had changed. For instance, Shania reflected on her experiences both pre- and post law reform:

Some would just be pricks and take you in and I think the worst thing I found was that you'd get taken in and then you'd have to go to court in the morning in your working gear ... And it was ... just like degrading ... Whereas now I think we're definitely treated better. There's definitely room for improvement but um definitely a lot treated a lot better now and not so stigmatised and not so, um, looked down upon now with them. (Shania, Christchurch)

The experiences recounted by the women indicated that although improvements could still be made, the law change had shifted the role of police so that some police were in a position to demonstrate genuine care for their safety. Bianca explained:

I didn't used to call the police I would just call my friend ... I think because it was the law then, you would get caught for it [working]. But now that it's changed and it's decriminalised and it's good because the police are watching out for the safety of us which is quite good. (Bianca, Wellington)

The legacy of criminalization and police power to control and discipline sex workers, however, meant that several women still found it difficult to trust, although they recognized that police were often caring for them. Hollie explained that while she trusted detectives, she had a lower level of trust for police on the beat, noting:

The detectives are different—to me they're a whole different situation, you know? Like there's the traffic and the patrol cops but the detectives are completely different. But I still don't trust them. I mean a cop's a cop. But yeah they try and talk to me and make sure I'm alright and I'm just like 'yeah just leave me alone, I'm fine'. (Hollie, Christchurch)

While Hollie didn't fully trust the police, her exchange demonstrates how in the decriminalized context, police power over sex workers is reduced since she *could* request that police leave her alone while working on the street. This indicates that the provision of rights has empowered sex workers, meaning not only that the police can look out for their safety and well-being but that the scope for police harassment of sex workers is also reduced.

Police interviewed for this research also talked about how they had worked to build trust with sex workers on the street since the law had changed. In Christchurch, this relationship building took place in unfortunate circumstances, in the aftermath of murders of three street-based sex workers since 2004. It was clear that these investigations had acted as a catalyst in prompting the police towards more meaningful and positive engagement with sex workers. One police key informant noted that during the first murder investigation, 'We then recognized that we actually needed to have a closer liaison with them and help them out a bit more because they were helping us. So it sort of just built up from there'. Thus, in Christchurch, the changing relationship between police and sex workers cannot be entirely attributed to the change in law since it was clear that the first murder investigation had also influenced this to some extent. It is

also likely that this proactive relationship building has influenced sex-worker perceptions of the police. Indeed, [Abel's \(2010\)](#) PhD research found that street-based sex workers in Christchurch were more positive about the police than those based in Auckland and Wellington ([Abel 2010](#)). This, perhaps, reflects efforts to engage with sex workers more positively in the context of the murders that have occurred in Christchurch. The impact of this was also evident in the responses of Christchurch-based sex workers and key informants. One key informant reflected on how some women who previously were very negative about the police had changed their view, noting 'A couple of girls who really, really didn't like the police said they're being amazing' (Key informant, Social Service). One of the women interviewed reflected that the recent murder investigation had prompted more positive engagement between police and sex workers:

I guess the Mellory thing has made the relationship a bit better with the working girls and the police. Like they talk to you, they look out for you ... They just will [ask], you know, 'are you ok? How's it been going?' You know ask 'have you seen anything shady?' (Shania, Christchurch)

The progress that was made in Christchurch in particular could be dismissed as *only* occurring as a consequence of violence and having nothing to do with decriminalization. However, this is an overly simplistic analysis of what has occurred. The impact of zero tolerance policing of sex workers in criminalized contexts has been highlighted elsewhere; it has been suggested that such strategies prevent potential witnesses from coming forward ([Brooks-Gordon 2006](#)). The experience in Christchurch clearly demonstrates how decriminalization has a significant impact in enabling relationships of trust to be built, and the crucial point is that this helped create an environment in which supportive relationships between police and sex workers on the street are actually possible.

One police key informant described the new relationship with street-based sex workers as defined by 'trust' and 'responsibility' noting '... the trust and the responsibility that falls on us with the prostitutes has been great - that's a criteria that we now live with' (Key informant, Police). Overall, it was clear that the police key informants interviewed now considered their role in the street sex industry to relate to violence prevention and support. A further key benefit of decriminalization was an enhanced capacity for information sharing. This was particularly beneficial in the context of the recent murder investigation, where sex workers and clients played a crucial role in the collection of evidence. However, information sharing went both ways and sex workers also described police efforts to share information with them about violent individuals who may approach sex workers. Pania explained how the police would warn her if there had been an incident:

[I find out] through other workers and through the police ... The police quite often come out and let us know that they won't give us the name of the girl that's gone in to make the complaint but they've come out to let us know about it. (Pania, Christchurch)

In Wellington, women also reported that the police warned them about incidents of violence in the local area. Lisa-Lou explained:

... Some of them come past and they ask if we're alright and stuff like that and we go 'yeah' ... I think that they know that we're in danger as well. Because I remember one time this girl, she got dragged around the corner and she got raped. This was just where we were working. So a bunch of them

came down and just said to us 'Be aware because there's this fella walking around', and they gave us a photo. 'Um just be aware because this fella's walking around and he's raping girls'. So you know, that's really nice from that kind of perspective. (Lisa-Lou, Wellington)

However, while the sharing of this information was appreciated by most of the women, several women expressed concerns that an overbearing police presence was interfering with business (Armstrong 2010). This was particularly the case in Christchurch where Pania noted:

I mean the cops are coming round every half and hour or so now ... We see more of them than we see clients which is quite freaky because clients freak out ... I mean they come round heaps but like they all know what I'm doing. And, you know, they see me and they'll just blabber or something. And I'm like 'well can you go away now. You're going to stop a client from coming'. And they're all good about it. (Pania, Christchurch)

Pania's experience further highlights how police power has been reduced by decriminalization, meaning that women can exercise their rights in these interactions without the risk of arrest that features in criminalized contexts. The fact that Pania could request police leave because they may *stop a client from coming* is significant. Making this request would have essentially been impossible before the law had changed, since Pania would have risked being arrested for soliciting. The law change can therefore be seen to have enabled a more balanced power relationship between police and sex workers through the provision of rights and removing the requirement that police control their work on the street.

### *Reporting violence*

It is well documented that sex workers are unlikely to report violence when they risk being arrested (Pyett and Warr 1997; 1999; Wotton 2005; Kinnell 2006a; Kinnell 2008). The findings of this research demonstrate how removing the threat of arrest can give sex workers more confidence to report violence, and increased belief that their reports will be taken seriously. In line with the findings of previous research carried out with sex workers in New Zealand after the law reform, the women and key informants stated that the decriminalization of sex work had made it easier for them to report violence to the police (Abel *et al.* 2007). This is not surprising given changes in the relationship between police and sex workers already described in this article. When comparing experiences of reporting violence pre and post law reform, the impact of these changes was particularly evident. One key informant explained the difficulties of reporting before the law change, noting:

Truly you were not going to ring the police and expect equal treatment. You have that expectation prior to the law change. You knew that you were breaking the law, they would see you in that way. And that they might come and do a round up on you ... That's a big change. (Key informant, NZPC)

It was clear that the law change had helped to remove some of the difficulties the women had engaging with the police before the law reform. Shania explained that before the law change, she had been reluctant to report an attack. However, if this happened to her in the decriminalized context, she felt confident that she would report it:

It builds a relationship I think with the police um in the fact that I feel confident enough now to go to them if need be, if anything you know went down whereas before you wouldn't. You would not

because chances are you're going to be arrested ... So I guess it's closed a bridge there ... Sort of made each other approachable ... If it happened now I would report it. I would definitely do that now. (Shania, Christchurch)

Another sex worker, Shannon, had received a dismissive response when reporting rape prior to the law change. However, she felt that the response would now be different, noting 'Well I think that was shit but now that the law's changed it's different ... Yeah like if it had been decriminalized back then well it would have been different' (Shannon, Christchurch). Sullivan (2004) has argued that the provision of legal rights for sex workers serves to increase recognition of the consensual capacity of those who sell sex, thus subsequently ensuring that non-consensual activity is more readily recognized and responded to in the criminal justice system (Sullivan 2004). The women's experiences suggest that the change in law gave them increased confidence that sexual violence would be more appropriately responded to in the decriminalized context. These responses suggest that in removing the threat of arrest, police power had been reduced, meaning sex workers would approach them more easily, and their safety could be better supported as a result.

### *Managing disputes*

Previous research has shown that sex workers manage a range of violence-related risks while working on the street (Sanders 2004; Kinnell 2008; Armstrong 2014). Whilst perpetrators are commonly labelled 'clients', experiences described by sex workers suggest that many perpetrators had no intention of paying for sex (Armstrong 2014). As such, these perpetrators cannot accurately be described as clients (Kinnell 2008). A number of studies have highlighted the fact that, in the main, sex workers describe ordinary and mundane interactions with their clients that are free from adverse incidents (Barnard 1993; Armstrong 2014). However, there are situations in which genuine clients do become violent. As a number of previous studies have documented, this often involves a dispute over payment or services provided (Sanders 2005; Kinnell 2008; Abel 2010). In agreement with these findings, several women in this study described disputes over payment or services with clients. In some situations, this involved the client covertly taking the money back after services had been provided, but in other situations involved more overt violence, or threats of it.

In a context in which sex workers or clients are criminalized, such as Northern Ireland, Sweden or the United States, seeking support from police in these situations would be extremely difficult. While in a context in which clients are criminalized, it may be assumed that it would in fact be easier to report such incidents, this is unlikely to be the case. If paying for sex is against the law, it is likely that the sex worker would receive no money at all if involving the police in a dispute over payment. In such contexts, police have the opportunity to exert considerable power over sex workers. Sex workers are therefore unlikely to involve the police since attracting police attention could have a negative impact on their business. However, from a safety perspective it is very important that sex workers *can* contact police in these circumstances since these are situations that can spiral into violence.

The women interviewed for this research, by comparison, indicated that the decriminalized context had enabled them to contact the police for assistance resolving disputes with clients over payment and services provided. When sex work is decriminalized, sex workers can talk specifically about the terms of the encounter and can name specific services and prices without fear of prosecution. For instance, Vixen described how she would react with clients who demanded refunds, noting 'I'd tell him to drive me to the police station and we'll deal with it in front of the police ... I don't want to really go to the police station but I will'. Similarly, Shannon described how she would simply leave if she became aware that a client had covertly removed the condom, since this was a service she did not agree to provide. If the client became abusive when she attempted to leave, she would say 'yell and abuse me all you like, I'm ringing the police'.

Although the law change had made it possible for sex workers to contact the police for assistance resolving disputes with clients, it was evident that involving police in these disputes did not always result in a satisfactory outcome for the sex worker. For instance, Amy described a situation she experienced:

I've had a few weird incidents where I thought I was right and I was wrong. Well the last client I had a fight with—he wouldn't pay me. I went to this house and when I went to leave his house he'd stolen the money off the table so I fought with him all the way to town. And when I got to town I was fucking angry and I was throwing stuff out of the car so I was trying to get him to just freak out and give me my money. And the policeman that turned up—I said, 'it was a \$100 job' and the guy goes 'no it was only sixty'. Well the police believed him and told him just to give me \$60. Well they should never have done that. And the cop with me was going 'oh you should be just happy you got some money out of him' ... I ended up doing everything four times and he complained about it and I end up with \$60 because a policeman says so ... And they wonder why the clients are doing shit, [it's] because they're getting away with it—the coppers are on their side. (Amy, Christchurch)

This experience suggests some positive change in that Amy was empowered to challenge the client in front of the police, which would have been highly problematic before the PRA was passed. However, this situation also raises questions about the attitudes of some police towards sex workers, and how they define such incidents in the contexts of sex work. While it is unclear precisely why the officer stated that Amy should be satisfied to have received *some money out of him*, there are several possibilities. One possibility is that officer may not recognize the exchange of sex for money as a genuine commercial transaction. It is unlikely that the officer would have considered any other worker 'lucky' to have received any payment for their labour. Another linked possibility is that the officer did not recognize the incident as crime, rather as a breach of contract matter. Regardless of the specific reason for this response, in siding with the client, the officer reinforced to Amy that the police could not entirely be relied on.

Another woman, Vixen, described a similar situation in which she had contacted the police to remove a problematic client from her home. She explained:

One not so long ago actually—I had to ring the police to get rid of the guy off my premises. I was with him for an hour and a half and he was on P and drunk and couldn't 'come'. And he started getting a bit rough because I said 'look we're going to finish the job soon so you're going to have to "come"'. And he couldn't 'come'. So I finished the job and he wanted half his money back. And because he wouldn't leave the premises I had to ring the police, you know? And that was in my house ... The

police had to take him away. But the woman police, when I explained the situation the woman police wanted me to give him half his money back. (Vixen, Christchurch)

These experiences reinforce the importance of the rights provided under the PRA that mean sex workers can now involve the police in disputes without risking being arrested themselves. However, the outcomes of these women doing so are troubling and suggest that perhaps such criminal acts against sex workers are not being recognized as crime, rather as breaches of contract, that police can do very little to rectify. This suggests a need to change attitudes to ensure that refusing to pay for sexual services provided is fully recognized as a criminal act, and that these incidents are resolved in a way that is more equitable for the sex worker. Indeed, it appears that attitudes and approaches may have already started to change. In 2014, it was reported that police escorted a man to a cash machine to pay a street sex worker what she was owed following a dispute over payment. A police spokesperson stated that this situation was not uncommon, noting 'It sounds remarkable but it is a routine thing. Police would help any citizen having a disagreement whether they were a sex-worker or working in a pizza shop' (Wynn 2014). The decriminalization of sex work thus represents a dramatic shift in how police interact with sex workers. Not only can sex workers report violence to the police, they can also involve the police in disputes, which would be highly problematic in criminalized contexts. The decriminalization of sex work therefore enables police to support the safety of street-based sex workers, in addition to their labour rights.

### *Ongoing Challenges and Tensions*

Decriminalization has resulted in a significant shift in the relationship between police and sex workers. However, since the sex industry does not exist in a social and legal vacuum, there are some enduring tensions. One such tension relates to the power imbalance that still inevitably exists between sex workers and police. The findings of this research illustrate how removing the threat of arrest had decreased overbearing police power over sex workers. Nevertheless, it would be naive to suggest this had equalized the power relationship. The propensity for some police to abuse their power over sex workers has been highlighted in contexts where sex work is criminalized, where police do have greater opportunities to exploit sex workers (Nixon *et al.* 2002; Hubbard 2004). In the United States, for instance, a study found that some sex workers reported being forced to provide sexual services for no payment and being beaten by the police (Silbert and Pines 1981). A small number of incidents described by women in this research illustrate how abuse of police power can still occur when sex work is decriminalized. Seventeen-year-old Hollie, for instance, described an incident in which she claimed a police officer had initially paid for sex and then blackmailed her to provide services free of charge, explaining 'Yeah. Like there's someone who's a cop in Christchurch who paid me and then blackmailed me and said [pause] you know, "well I'll do over your fucking mates, raid their houses and stuff"'. Although such incidents are possible regardless of the laws surrounding sex work, what can be controlled is whether such abuses of power can be challenged, and how the police as an institution respond to reports of this behaviour. A similar incident to that described by Hollie had occurred in Christchurch months prior to the fieldwork for this research. The police were informed of this incident and took swift action resulting in the offending officer being jailed for



two years (Steward 2009). While it is unfortunate that this behaviour occurred at all, it is unlikely that it would have been addressed so readily had sex work been criminalized, since the risk of arrest would have further constrained the victim's ability to report the behaviour. Decriminalization cannot be expected to prevent corrupt and exploitative behaviour by individuals, but what it can offer is an environment in which this behaviour can be much more readily addressed.

### *Discussion*

The relationship between police and sex workers is fraught in most parts of the world, particularly in countries where sex workers or their clients are criminalized. This is because in such countries the police are tasked with arresting sex workers or clients, and therefore yield considerable power over those who sell sex. This creates a relationship based on suspicion, fear and animosity where the police are avoided and much of the violence that sex workers experience goes unreported. The findings of this paper indicate how decriminalizing sex work can benefit relationships between police and street-based sex workers. The New Zealand model of decriminalization, it can be argued, helps to address the power imbalance between police and sex workers in two specific ways. First, it reduces the power police have over sex workers by removing the threat of arrest. And second, it empowers sex workers through the provision of rights. The findings of this paper offer important insights into what decriminalization can offer to those often considered the most vulnerable population of sex workers, and a vision of how relationships between sex workers and police could be transformed in other countries. The criminalization of sex workers, it can be argued, creates a problematic power dynamic in which sex workers are disadvantaged by the constant risk of criminalization. What this means is that there is little scope for sex workers to challenge police if they feel harassed, and the negative implications of drawing police attention means that reporting violence is particularly difficult. The findings of this research demonstrate how decriminalization had helped to reduce police power over sex workers, meaning that they had more trust in police and significantly increased scope to challenge them if necessary.

Police key informants interviewed noted that the law change had enabled them to take a proactive interest in sex-worker safety. This was also beneficial to the police as this new relationship dynamic provided scope for more information sharing, which assisted in resolving crime. Police often rely on sex workers to assist in resolving crime, even when sex work is criminalized. However, in such contexts police may expect sex workers to assist them while still enforcing kerb crawling legislation (Kinnell 2006b). This creates an unhelpful situation for both police and sex workers through a significant imbalance of power. In such situations, it may be in sex workers' interests that they assist with investigations, particularly when a co-worker has been harmed. However, when doing so involves accepting the risk of criminalization and assisting an organization tasked with controlling their work and disciplining them for their involvement in it, any reluctance to assist is understandable. The decriminalization of street-based sex work simplifies these situations for both sex workers and police by reducing police power and affording rights to sex workers. Sex-worker safety is therefore better supported as a result.

A positive relationship between police and sex workers is particularly important in the context of addressing violence and harassment perpetrated against those working on the street. Decriminalization of sex work in New Zealand has not eliminated violence against sex workers. This continued violence, and specifically three murders that have occurred in Christchurch since 2003, has been cited by some activists and scholars as evidence that decriminalization hasn't worked to keep sex workers safer (Farley 2008). However, this is an overly simplistic argument for several reasons. Acts such as assault, rape and murder are against the law regardless of the legal framework surrounding sex work and, as such, no legal framework can be expected to prevent violence. What the law does influence is the likelihood of perpetrators being held to account. The murders of three street sex workers in Christchurch were all thoroughly investigated and the perpetrators received lengthy sentences (Clarkson 2014). This is in stark contrast to other countries such as Canada where police have failed to fully investigate reports of missing street-based sex workers (Abel 2014). Police interviewed for this research emphasized how important it was that they could talk to sex workers in the course of these investigations. If sex work had been criminalized, this level of dialogue between police, sex workers and clients could have been severely inhibited. Thus, rather than suggesting decriminalization is deficient, the response to this continued violence represents a particularly compelling example of the very positive relationship that is possible between police and sex workers when sex work is decriminalized.

This paper has provided important insights into how decriminalizing sex work can impact relationships between police and sex workers, and therefore better support sex-worker safety as a consequence. This research makes a unique contribution to the sex-work research field, and the broader field of research on violence against women. The majority of existing research on street-based sex work has been conducted in contexts in which street-based sex workers or their clients are criminalized. The research presents an original case study, showing in great depth how the decriminalization of street-based sex work can positively transform the relationship between police and street-based sex workers.

This research also provides an important challenge to constructions of street sex workers as lacking in agency and requiring rescue from their involvement in prostitution. The findings demonstrate how sex workers can proactively call on police to better support their safety on the street when the risk of arrest is removed. In contrast, relationships between police and sex workers are fraught throughout the world in places where police are tasked with controlling and punishing sex workers. In the context of international debates on sex-worker safety, the experiences discussed in this paper offer a vision for what these relationships could look like if other countries follow New Zealand's lead.

## REFERENCES

- ABEL, G. (2010), 'Decriminalisation: A Harm Minimisation and Human Rights Approach to Regulating Sex Work', unpublished doctoral dissertation, University of Otago.  
 —. (2014), 'A Decade of Decriminalisation: Sex Work 'Down Under' But Not Underground', *Criminology and Criminal Justice*, 14: 580–92.

- ABEL, G., FITZGERALD, L. and BRUNTON, C. (2007), *The Impact of the Prostitution Reform Act on the Health and Safety Practices of Sex Workers*. Department of Public Health and General Practice, University of Otago.
- ARMSTRONG, L. (2010), 'Out of the Shadows (and into a bit of light): Decriminalisation, Human Rights and Street-Based Sex Work in New Zealand', in K. Hardy, S. Kingston and T. Sanders, *New Sociologies of Sex Work*. Ashgate.
- . (2012), 'Reflections on a Research Process: Exploring Violence against Sex Workers from a Feminist Perspective', *Women's Studies Journal*, 26: 2–10.
- . (2014), 'Diverse Risks, Diverse Perpetrators: Violence Risk Perception amongst Street-based Sex Workers in New Zealand', *International Journal for Crime, Justice and Social Democracy*, 3: 40–54.
- BARNARD, M. (1993), 'Violence and Vulnerability: Conditions of Work for Streetworking Prostitutes', *Sociology of Health & Illness*, 15: 683–705.
- BARRY, K. (1984), *Female Sexual Slavery*. New York University Press.
- BROOKS-GORDON, B. (2006), *The Price of Sex: Prostitution, Policy and Society*. Willan Publishing.
- . (2008), 'State Violence towards Sex Workers: Police Power Should Be Reduced and Sex Workers' Autonomy and Status Raised', *British Medical Journal*, 337: a908.
- BUSCH, N. B., BELL, H., HOTALING, N. and MONTA, M. A. (2002), 'Male Customers of Prostituted Women: Exploring the Perceptions of Entitlement to Power and Control and Implications for Violent Behavior toward Women', *Violence Against Women*, 8: 1093–112.
- CAMPBELL, R. (2014), 'Not Getting Away with It: Linking Sex Work and Hate Crime in Merseyside', in N. Chakraborti and J. Garland, eds, *Responding to Hate Crime: The Case for Connecting Policy and Research*. The Policy Press.
- CHURCH, S., HENDERSON, M., BARNARD, M. and HART, G. (2001), 'Violence by Clients Towards Female Prostitutes in Different Work Settings: Questionnaire Survey', *British Medical Journal*, 322: 524–5.
- CLARKSON, D. (2014), 'Life in Jail for Mellory Manning Murder', *The Press*, 1 May, available online at <http://www.stuff.co.nz/national/crime/9996631/Life-in-jail-for-Mellory-Manning-murder> (last accessed 14 July 2015).
- Connell and Hart. (2003), 'An Overview of Male Sex Work in Edinburgh and Glasgow: The Male Sex Worker Perspective', Occasional Paper No. 8, June. MRC Social and Public Health Sciences Unit.
- DAY, S. and WARD, H. (2007), 'British Policy Makes Sex Workers Vulnerable', *British Medical Journal*, 334: 187.
- DONAVAN, B., HARCOURT, S., O'CONNOR, J., WAND, H., LU, H. and McNULTY, A. (2008), 'Sex Work in a Decriminalised and Unlicensed Environment: A 15-Year Study in Sydney', Paper presented at Sexual Health Congress, Perth, Australia, 16 September 2008.
- EKBERG, G. (2004), 'The Swedish Law That Prohibits the Purchase of Sexual Services: Best Practices for Prevention of Prostitution and Trafficking in Human Beings', *Violence Against Women*, 10: 1187–218.
- FARLEY, M. (1998), 'Prostitution, Violence and Post-Traumatic Stress Disorder', *Women and Health*, 27: 37–47.
- . (2004), 'Bad for the Body, Bad for the Heart': Prostitution Harms Women Even if Legalised or Decriminalised', *Violence Against Women*, 10: 1087–125.
- . (2008), 'What Really Happened in New Zealand after Prostitution Was Decriminalised in 2003?', available online at <http://www.prostitutionresearch.com/Report%20on%20NZ%2010-29-2008.pdf> (last accessed 5 January 2009).

- FARLEY, M. and KELLY, V. (2000), 'Prostitution: A Critical Review of the Medical and Social Sciences Literature', *Women and Criminal Justice*, 11: 29–64.
- FRANCES, R. and GRAY, A. (2007), 'Unsatisfactory, Discriminatory, Unjust and Inviting Corruption: Feminists and the Decriminalisation of Street Prostitution in New South Wales', *Australian Feminist Studies*, 22: 307–24.
- GOODYEAR, M. and CUSICK, L. (2007), 'Protection of Sex Workers', *British Medical Journal*, 334: 52–3.
- HUBBARD, P. (2004), 'Cleansing the Metropolis: Sex Work and the Politics of Zero Tolerance', *Urban Studies*, 41: 1687–702.
- JEFFREY, L. A. and SULLIVAN, B. (2009), 'Canadian Sex Work Policy for the 21st Century: Enhancing Rights and Safety, Lessons from Australia', *Canadian Political Science Review*, 3: 57–76.
- JEFFREYS, S. (1997), *The Idea of Prostitution*. Spinifex.
- JONES, T. and NEWBURN, T. (2001), *Widening Access: Improving Police Relations with Hard to Reach Groups*. London Home Office Policing and Reducing Crime Unit.
- KINNELL, H. (2006a), 'Clients of Female Sex Workers: Men or Monsters?', in R. Campbell and M. O'Neil, eds, *Sex Work Now*. Willan.
- . (2006b), 'Murder Made Easy: The Final Solution to Prostitution?', in R. Campbell and M. O'Neil, eds, *Sex Work Now*. Willan.
- . (2008), *Violence and Sex Work in Britain*. Willan.
- KRÜSI, A., PACEY, K., BIRD, L., TAYLOR, C., CHETTIAR, J., ALLAN, S., BENNETT, D., MONTANER, J., KERR, T. and SHANNON, K. (2014), 'Criminalisation of Clients: Reproducing Vulnerabilities for Violence and Poor Health Among Street-Based Sex Workers in Canada—A Qualitative Study', *BMJ Open*, 4: e005191.
- LEE-TREWEEK, G. and LINKOGLE, S. (2000), *Danger in the Field: Risk and Ethics in Social Research*. Routledge.
- LOWMAN, J. (2000), 'Violence and the Outlaw Status of (Street) Prostitution in Canada', *Violence Against Women*, 6: 987–1011.
- MAY, T., EDMUNDS, M. and HOUGH, M. (1999), 'Street Business: The Links between Sex and Drug Markets', Police Research Series Paper 118. Home Office, PRCU.
- McKEGANEY, N. and BARNARD, M. (1996), *Sex Work on the Street: Prostitutes and their Clients*. Open University Press.
- MILLER, J. (1993), '“Your life is on the Line Every Night You're on the Streets”: Victimization and the Resistance Among Street Prostitutes', *Humanity and Society*, 17.
- MULLIN, F. (2015), 'Arbitrary 'Prostitute Cautions' are Chaining British Sex Workers to the Streets', 6 March, available online at [http://www.vice.com/en\\_uk/read/uk-sex-work-care-jobs-235](http://www.vice.com/en_uk/read/uk-sex-work-care-jobs-235) (last accessed 15 July 2015).
- MURPHY, C. (2015), 'Sex Workers Rights are Human Rights', 14 August, available online at <https://www.amnesty.org/en/latest/news/2015/08/sex-workers-rights-are-human-rights/> (last accessed 1 September 2015).
- NIXON, K., TUTTY, L., DOWNE, P., GORKOFF, K. and URSEL, J. (2002), 'The Everyday Occurrence: Violence in the Lives of Girls Exploited Through Prostitution', *Violence Against Women*, 8: 1016–104.
- O'NEILL, M. (1996), 'Researching Prostitution and Violence: Towards a Feminist Praxis', in M. Hester, L. Kelly and J. Radford, eds, *Women, Violence and Male Power: Feminist Activism, Research and Practice*. Open University Press.

- PERKINS, R. (1993), 'Street Prostitution and Its Manipulation by Law in New South Wales', in P. Easteal. and S. McKillop, eds, *Women and the Law: Proceedings of a Conference Held 24–26 September 1991*. Australian Institute of Criminology.
- PHOENIX, J. (1999), *Making Sense of Prostitution*. Macmillan Press.
- . (2006). 'Regulating Prostitution: Controlling Women's Lives', in F. Heidensohn, ed., *Gender and Justice: New Concepts and Approaches*. Willan.
- . (2008), 'Be Helped or Else! Economic Exploitation, Male Violence and Prostitution Policy in the UK', in V. E. Munro. and D. G. Marina, eds, *Demanding Sex: Critical Reflections on the Regulation of Prostitution*. Ashgate.
- PITCHER, J., CAMPBELL, R., HUBBARD, P., O'NEILL, M. and SCOULAR, J. (2006), *Living and Working in Areas of Street Sex Work: From Conflict to Coexistence*. Joseph Rowntree Foundation.
- PLUMRIDGE, E. (2001), 'Rhetoric, Reality and Risk Outcomes in Sex Work', *Health, Risk and Society*, 3: 199–215.
- Prostitution Law Review Committee. (2008), *Report of the Prostitution Law Review Committee on the Operation of the Prostitution Reform Act 2003*. Ministry of Justice.
- PYETT, P. and WARR, D. (1997), 'Vulnerability on the Streets: Female Sex Workers and HIV Risk', *AIDS Care*, 9: 539.
- . (1999), 'Women at Risk in Sex Work: Strategies for Survival', *Journal of Sociology*, 35: 183–97.
- QUADARA, A. (2008), *Sex Workers and Sexual Assault in Australia: Prevalence, Risk and Safety*. Australian Centre for the Study of Sexual Assault.
- RAYMOND, J. (2003), 'Ten Reasons for Not Legalising Prostitution and a Legal Response to the Demand for Prostitution', *Journal of Trauma Practice*, 2: 315–32.
- RHODES, T., SIMIC, M., BAROS, S., PLATT, L. and ZIKIC, B. (2008), 'Police Violence and Sexual Risk Among Female and Transvestite Sex Workers in Serbia: A Qualitative Study', *British Medical Journal*, 337: A811.
- SAGAR, T. (2007), 'Tackling On-street Sex Work: Anti-Social Behaviour Orders, Sex Workers and Inclusive Inter-agency Initiatives', *Criminology and Criminal Justice*, 7: 153–68.
- SALFATI, C. G., JAMES, A. R. and FERGUSON, L. (2008), 'Prostitute Homicides: A Descriptive Study', *Journal of Interpersonal Violence*, 23: 505–43.
- SANDERS, T. (2001), 'Female Street Sex Workers, Sexual Violence, and Protection Strategies', *Journal of Sexual Aggression*, 7: 5–18.
- . (2004), 'The Risks of Street Prostitution: Punters, Police and Protesters', *Urban Studies*, 41: 1703–17.
- . (2005), *Sex Work: A Risky Business*. Willan.
- SANDERS, T., O'NEIL, M. and PITCHER, J. (2009), *Prostitution: Sex Work, Policy and Politics*. Sage.
- SHANNON, K., KERR, T., STRATHDEE, S., SHOVELLER, J., MONTANER, J. and TYNDALL, M. (2009), 'Prevalence and Structural Correlates of Gender-Based Violence Among a Prospective Cohort of Female Sex Workers', *British Medical Journal*, 339: b2939.
- SILBERT, M. H. and PINES, A. M. (1981), 'Occupational Hazards of Street Prostitutes', *Criminal Justice and Behavior*, 8: 395–99.
- STEWART, I. (2009), 'Ex-cop Jailed for Sex with Prostitute', *The Christchurch Press*, 17 December, available online at [http://www.nzherald.co.nz/nz/news/article.cfm?c\\_id=1&objectid=10616073](http://www.nzherald.co.nz/nz/news/article.cfm?c_id=1&objectid=10616073) (last accessed 12 January 2010).

- SULLIVAN, B. (2008), 'Working in the Sex Industry in Australia: The Reorganisation of Sex Work in Queensland in the Wake of Law Reform', *Labour & Industry*, 18: 73–92.
- THORNTON, B. (2003), 'Police AIDS 'Witch-Hunt' Criticised', *BBC News Online*, 2 July, available online at [http://news.bbc.co.uk/2/hi/uk\\_news/england/berkshire/3038666.stm](http://news.bbc.co.uk/2/hi/uk_news/england/berkshire/3038666.stm) (last accessed 11 August 2015).
- VALERA, R., SAWYER, R. and SCHIRALDI, G. (2001), 'Perceived Health Needs of Inner-City Street Prostitutes: A Preliminary Study', *Journal of Health Behaviour*, 25: 50.
- VANWESENBEECK, I. (2001), 'Another Decade of Social Scientific Work on Sex Work: A Review of Research 1990–2000', *Annual Review of Sex Research*, 12: 242–89.
- WILLIAMSON, C. and FOLARON, G. (2001), 'Violence, Risk, and Survival Strategies of Street Prostitution', *Western Journal of Nursing Research*, 23: 463–75.
- . (2003), 'Understanding the Experiences of Street Level Prostitutes', *Qualitative Social Work*, 2: 271–87.
- WOTTON, R. (2005), 'The Relationship Between Street-based Sex Workers and the Police in the Effectiveness of HIV Prevention Strategies', *Research for Sex Work*, 8: 11–3.
- WYNN, K. (2014), 'Police Help Short-Changed Sex Worker', *New Zealand Herald*, 13 July, available online at [http://www.nzherald.co.nz/nz/news/article.cfm?c\\_id=1&objectid=11292537](http://www.nzherald.co.nz/nz/news/article.cfm?c_id=1&objectid=11292537) (last accessed 21 July 2015).